

1 Robert A. Mittelstaedt (#060359)
2 ramittelstaedt@jonesday.com
3 Caroline N. Mitchell (#143124)
4 cnmitchell@jonesday.com
5 JONES DAY
6 555 California Street, 26th Floor
7 San Francisco, CA 94104
8 Telephone: (415) 626-3939
9 Facsimile: (415) 875-5700

10 Attorneys for Defendants

11 CINDY A. COHN, ESQ. [S.B.#145997]
12 cindy@eff.org
13 ELECTRONIC FRONTIER FOUNDATION
14 454 Shotwell St.
15 San Francisco, California 94110
16 Telephone: (415) 436-9333, Ext. 108
17 Facsimile: (415) 436-9993

18 Attorneys for Plaintiffs (continued on last page)

19 LARRY BOWOTO, et. al.
20 Plaintiffs,
21 v.
22 CHEVRONTEXACO CORPORATION, et
23 al.,

24 Defendants.

25 **Case No. C-99-2506-SI**

26 **PARTIES' STIPULATION
REGARDING BIFURCATION OF BILL OF
COSTS ISSUE AND BRIEFING SCHEDULE
FOR FIRST PHASE OF OPPOSITION TO
BILL OF COSTS**

27 WHEREAS, Defendants filed a Bill of Costs on December 16, 2008 (Document 2274),
28 WHEREAS on December 23, 2008, the Court granted a stay of the Bill of Costs until after
determination of the Motion for New Trial (Document 2278).

29 WHEREAS the Motion for New Trial has been decided (Document 2288),

30 SFI-605823v1

WHEREAS the parties have agreed to bifurcate consideration of the Objections to Bill of Costs under Local Rule 54-2 and have agreed to a briefing and argument schedule for the first phase of that bifurcated argument that is different than that provided in Local Rule 54-2,

THE PARTIES HEREBY STIPULATE THAT:

1. The schedule for consideration of whether costs should be awarded shall be as follows:

Opposition to Defendants' Bill of Costs on Issue of Whether Costs Should Be Awarded: March 27

Reply: April 10

Hearing: April 24

2. The parties shall meet and confer about a schedule for the consideration of the specific costs to be awarded, if needed, after the Court decides whether costs should be awarded.

DATED: March 19, 2009 JONES DAY

JONES DAY

DATED: March 19, 2009

ELECTRONIC FRONTIER FOUNDATION

By: _____ //s//
Cindy Cohn
Attorneys for Plaintiffs

IT IS SO ORDERED.

DATED: March , 2009

By: The Hon. Susan Illston
The Hon. Susan Illston
United States District Court Judge

1 Counsel for Plaintiffs (continued from first page)

2 THERESA TRABER, ESQ. [SBN 116305]

tmt@tvlegal.com

3 BERT VOORHEES, ESQ. [SBN 137623]

bv@tvlegal.com

4 LAURA FAER [SBN 233846]

lf@tvlegal.com

5 TRABER & VOORHEES

128 North Fair Oaks Avenue, Suite 204

6 Pasadena, California 91103

Telephone: (626) 585-9611

7 Facsimile: (626) 577-7079

JUDITH BROWN CHOMSKY, ESQ.

jchomsky@igc.org

LAW OFFICES OF JUDITH BROWN
CHOMSKY

Post Office Box 29726

Elkins Park, PA 19027

Telephone: (215) 782-8367

Facsimile: (215) 782-8368

8 BARBARA ENLOE HADSELL, ESQ. [SBN

086021]

bhadsell@hadsellstormer.com

9 DAN STORMER, ESQ. [SBN 101967]

dstormer@hadsellstormer.com

10 LAUREN TEUKOLSKY, ESQ. [SBN 211381]

lauren@hadsellstormer.com

11 LAW OFFICE OF HADSELL & STORMER,

12 INC.

13 128 North Fair Oaks Avenue, Suite 204

Pasadena, California 91103-3664

14 Telephone: (626) 585-9600

Facsimile: (626) 585-9600

JENNIFER M. GREEN, ESQ.

jgreen@ccr-ny.org

CENTER FOR CONSTITUTIONAL
RIGHTS

666 Broadway, 7th Floor

New York, NY 10012

Telephone: (212) 614-6431

Facsimile: (212) 614-6499

15 RICHARD HERZ, ESQ.

rick@earthrights.org

16 MARCO SIMONS, ESQ. [SBN 237314]

marco@earthrights.org

17 EARTHRIGHTS INTERNATIONAL

1612 K St. N.W., Suite 401

Washington, DC 20006

18 Telephone: (202) 466-5188

19 Facsimile: (202) 466-5189

20 MICHAEL S. SORGEN, ESQ. [SBN 43107]

msorgen@sorgen.net

21 LAW OFFICES OF MICHAEL S. SORGEN

22 240 Stockton Street, 9th Floor

San Francisco, California 94108

23 Telephone: (415) 956-1360

24 Facsimile: (415) 956-6342

25 JOSE LUIS FUENTES, ESQ. [SBN 192236]

jlf499@sbcglobal.net

26 SIEGEL & YEE

499 14th Street, Suite 220

27 Oakland, Ca 94612

Telephone: (510) 839-1200

28 Facsimile: 510-444-6698

RICHARD R. WIEBE [SBN 121156]

wiebe@pacbell.net

29 LAW OFFICES OF RICHARD R. WIEBE

425 California Street, #2025

San Francisco, CA 94104

Telephone: (415) 433-3200

Facsimile: (415) 433-6382